

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”)
an individual,
Kenneth Petty, AKA (“Zoo”),
an individual

Defendants.

Civil Action No. 21-cv-4568

Declaration of Jennifer Hough

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I, Jennifer Hough, hereby declare according to 28 U.S.C. §1746 as follows:

1. I submit this Declaration in opposition to Defendant Kenneth Petty’s (“Defendant Petty”) motion to vacate the Certificate of Default Judgment issued against him. As the Plaintiff, I have personal knowledge of the facts outlined in this Declaration.
2. I respectfully request that the Court deny Defendant Petty’s instant motion to vacate the Certificate of Default Judgment issued against him on October 19, 2021.
3. The facts relevant to this opposition and case began on September 16, 1994.
4. On September 16, 1994, I was sixteen years old. That day began like every other day. I woke up, got dressed, and left my (adopted) grandmother’s house in Jamaica, Queens to attend high school. Specifically, I attended John Adams High School.
5. Like every other school day, I headed towards the Q7 MTA bus stop situated on 145th Street and Rockaway Blvd. to travel to school. While en route, I saw from a distance that Defendant Petty was standing at the bus stop. This was unusual because Defendant Petty’s motus

operandi was to stand outside of the corner store located across the street from the bus stop. He usually did not stand at the bus stop itself.

6. I knew Defendant Petty as "Kenny," which he was known by in the neighborhood. He had a reputation of being a neighborhood delinquent, member of the Bloods gang, and for cutting school. Kenneth Petty was standing at the bus stop when I arrived.

7. After a brief exchange commenced by Defendant Petty, I turned my back to see if the bus or a dollar van was coming. But, then, as I turned my back, Defendant Petty approached me from behind. Kenny grabbed the back of my jacket firmly and pressed a knife into my back, and told me to "start walking."

8. I tried to turn around, but Defendant Petty would not let me go, nor would he take the knife from my back. I began pleading for my life; "Kenny, where are we going?" "Kenny, please just let me go." Defendant Petty callously ignored my pleas. He apparently had already decided that he was going to kidnap me.

9. Defendant Petty forcibly brought me to a house around the corner from the bus stop. While walking, Defendant Petty never let loose of his grip on my clothing and kept the knife pressed against my back. I was too scared to even scream.

10. Defendant Petty kicked the house's door open, pushed me inside and forced me up the stairs, with the knife still to my back.

11. I cried the entire way up the stairs, pleading for my life, while absolutely terrified what Defendant Petty would do next. I pled and wept, barely articulating, "what do you want from me? Why am I here?" Defendant Petty apathetically exclaimed, "you know what I want."

12. Once inside, Defendant Petty began trying to take my clothes off. I fought him to prevent it, but, he ultimately, pushed me onto a bed, held me down with his bodyweight and forcibly

ripping my pants off but I tried to hold on. I fought with all of my strength to hold onto my jeans. Then, Defendant Petty grabbed the knife again, which he had put down, pressed it to my stomach, causing a small cut, and threatened to stab me if I did not let go of my jeans.

13. After being threatened Defendant Petty threatened me with the knife, I gave into him, hoping that the rape would end quickly. My only goal was to get out of the house alive.

14. Once Defendant Petty finished raping me, he got up, stood in the mirror, and beat on his chest, stating, "I am the man, I am the man" repeatedly. As he was beating his chest in the mirror, I mustered all the strength I had to get up, and whimpered, "can I please leave?" I attempted to walk towards the door, and Defendant Petty blocked me from leaving. All I could do at that point was to beg and plead to Defendant Petty for my freedom, "please let me go, I promise I won't say anything." I was saying anything that could get me out of the house.

15. While he continued admiring himself in the mirror, he attempted to light a "celebratory" cigarette. So, hoping that it could get me out of the house, I offered to light the cigarette for him. I lit a match and attempted to throw the lit flame towards a roll of toilet paper on the dresser in front of me in hopes of setting the toilet paper ablaze. Unfortunately, the flame went out before it reached the toilet paper roll.

16. Then, I grabbed a bottle of contact solution on the dresser. I threw it with whatever strength I had left at Defendant Petty's head. Defendant Petty ducked to avoid being hit by the contact solution bottle, and I pushed him with all my might, and thankfully, he fell down, and I sprinted down the stairs.

17. Defendant Petty quickly got up and yelled down the stairs as I was running, "Nobody is going to believe you." Nonetheless, I did not stop running, and sprinted at least 20 blocks until I reached John Adams High School.

18. As soon as I arrived, I informed the school security guards of what happened, and they immediately contacted the police. Once the police arrived, they questioned me and placed me in a van to go to the house to confirm where Defendant Petty raped me.

19. The police found Defendant Petty still in the house where he raped me and was arrested on the spot. I confirmed his identity with the officers, and they took Defendant Petty to the police station and brought me to the hospital to get checked out. At the hospital, I was asked to undress and I was physically examined.

20. My friend brought me home from the hospital. And hours after being violently raped, when I got into the house my adopted grandmother (the woman who raised me) said, "I am sorry you got raped, but you should have screamed."

21. One day after he raped me, Defendant Petty's parents showed up at my house. This was the beginning of the worst period of my life. My family and I began receiving death threats. People were calling the house phone, threatening my adopted grandmother, telling her that I had better drop the charges of rape against Defendant Petty.

22. Defendant Petty's parents went so far as falsely asserting that I was his girlfriend, and that I was only accusing him of rape out of anger because he broke up with me. This was a complete lie. I never dated Defendant Petty, nor even knew him aside from seeing him in the neighborhood and hearing about him via word of mouth.

23. The harassment and intimidation by Defendant Petty's parents were relentless. Defendant Petty's parents forced me to go with them to the Queen's District Attorney. While there, they attempted to pose as my aunt and uncle to get me to drop the charges against Defendant Petty.

24. Shortly after the visit from Kenny's parents, my household began receiving more death threats. Rumors circulated in the neighborhood that something would happen to me if I did not

drop the charges. Kenny is a member of the Makk Ballers set of the Bloods Gang located in the Jamaica Queens neighborhood, and threats of that nature are not taken lightly.

25. After the death threats, my adopted family began to turn on me because they were afraid of the violence that Kenny and his Makk Baller associates brought to our doorstep.

26. As a sixteen-year-old, I felt exposed, confused, afraid, and alone. I had just been brutally raped; I could not go outside without the fear of being retaliated against for telling the police, and now I was afraid to be home because I was being threatened by outsiders for telling the police and by my family for bringing death threats and violence to our home.

27. I was constantly beaten and verbally abused in the street and my home because everyone wanted me to drop the charges against Kenny.

28. On the day of Kenny's criminal proceeding, my family forced me to go to the hearing even though the District Attorney said I did not have to be there. I was not testifying because Kenny had already taken a plea deal for attempted rape. My family hid me in the stairwell with the intent to bring me into the courtroom at the beginning of the proceeding. I was standing in the stairwell the entire time, mentally in shambles.

29. The Queens District Attorney happened to take the stairs that day and ran into me sitting on the stairs with my family members. She asked me what I was doing there. I told the truth and said, "They are forcing me to drop the charges." The DA responded that she would handle it.

30. When everyone was in Court, the Judge asked if anyone had anything to say. I stood up and stated that I wanted to drop the charges. The Judge did not find my statement very convincing and stated, "take that up with the District Attorney."

31. When I got home from Court, I was beaten because my family felt I was not convincing enough for the Judge. My family was afraid of what would happen because Kenny was now facing prison time.

32. Due to the mental trauma from the rape by Kenny and everything that transpired after, the constant beatings from my family, and the verbal abuse at home, I ran away from New York City and moved to Florida with my uncle.

33. I thought my uncle would protect me. Instead, he ended up raping me shortly after my arrival. I left my uncle's home in Florida and have been on my own ever since.

34. I was mentally and emotionally destroyed and attempted to find value and kindness in anything I could—partying, drugs, living in the streets, in and out of shelters. My self-worth was at zero, my emotions were empty, and I was lost.

35. I moved around a lot because I was too afraid to go back to New York for fear of someone recognizing me. I had four children, numerous failed relationships, and never knew a true home in my entire life.

36. In 2016, I moved to Atlanta, Georgia, where I met my husband, whom I wed in 2018. I was finally beginning to learn to be happy and love myself.

37. In 2018, Maraj posted that she was doing a turkey giveaway in Queens, New York, on Rockaway Blvd. and 147th street. This attracted much attention given how big of a star Maraj is, and since Queens was her hometown.

38. On November 25, 2018, Maraj posted a picture of her and Kenny. It appeared they were dating, and in the photo, they were throwing up gang signs.

39. Toward the end of November, Maraj posted another picture of her and Kenny and replied to a comment stating, "Kenny was 15, she¹ was 16 and, in a relationship, but go awf Internet." (**Exhibit A**). This was picked up by every publication, tabloid, iheartradio, USA today, bloggers, and YouTubers.

40. As a result of Maraj's post, I was sought after for comment. Seeing no choice than to defend the truth, I recorded an interview with a YouTube blogger, giving my side of the story. I thought that would be the end of it.

41. In November 2019, Maraj did a show called "shade no shade" on Queen radio. She defamed my character when she repeated the same lie that Kenny was 15 years old but now added that he was "wrongly accused," "he did not have bail money," and said that I had "written a letter recanting my statement" but would face 90 days in jail if I had done so – which was all false.

42. Maraj also stated, "but white is right," because I am biracial (my deceased mother was Caucasian, and my father is African American). This was troubling because Maraj was trying to paint a narrative that my accusation of Kenny's rape was analogous to that of Emmett Till.

43. These statements by Maraj put social media in a frenzy trying to figure out who I was; if indeed I was a white woman, and where I currently lived.

44. In March 2020, Kenny was arrested for failing to register as a sex offender in California. This came as a surprise to me because Kenny had consistently registered as a sex offender from 2013 to 2018, just before appearing in queens with Maraj.

45. A few days after the arrest the I was contacted by someone whom I believed was an old childhood friend. Barry Dukes, aka "Black." We caught up, and the topic of my 1994 rape came

¹ Referencing me.

up, to which I stated, "I wished it could all just go away forever." Black responded, "I can make that happen."

46. A few days later, Black called me and informed me that Maraj had asked for my phone number and that he had given it to her. Black sent me a text message of a screenshot he received from Kenny. In the message was a phone number with the name wifey. (**Exhibit B**). Black informed me that I would receive a call from Maraj from that number. Shortly after that, Maraj called me.

47. During the call, Maraj stated she heard I was willing to "help out" their situation and stated that she would fly my family and me to Los Angeles. I declined this offer.

48. Maraj then stated she would send her publicist to me to craft a statement recanting my rape charge. I denied this offer as well.

49. Before we got off the phone, I said to Maraj, "I need you to know woman to woman, that this happened." Maraj hung up the phone. Within days of this conversation, my family and I suffered an onslaught of harassing calls and unsolicited visits.

50. A few days after Maraj called me, my brother called me. He stated two people reached out to a family member stating an offer of \$500,000.00 from Maraj if I wrote a letter recanting the rape claim against Kenny.

51. This act by Maraj and her associates caused me to panic because Black, who was in contact with Maraj, now knew where I lived, where I worked, and my kids' identity.

52. In April 2020, on behalf of Kenny, factfinder/investigator Charles Mittelstadt from Georgia contacted me. He put me in contact with an attorney named Ian Wallach ("Attorney Wallach") from New York.

53. Kenny's legal team hired Attorney Wallach to give me "legal advice" about recanting the 1994 rape statement.

54. Attorney Wallach stated he was my lawyer, and anything said to him was protected under attorney-client privilege. I did not know Attorney Wallach and had not reached out to him for legal services.

55. I told Attorney Wallach Maraj, and Kenny was sending people to my home and to the homes of my loved ones to get me to recant my true statement that Kenny violently raped me. Attorney Wallach promised to help me, but he never did.

56. Black continued to receive and relay messages from Kenny and Maraj and relayed them to me. For a while, I ignored Black's calls. When I finally answered, and he told me that he had good news and stated that nothing would happen to me if I signed and notarized some papers in his possession.

57. Shortly after the call, Black appeared in front of my home. To protect my children in my home, I met Black in front of my house in his car. While in his car, Black pulled out a green-colored folder that had a document inside. This document was a written recanted statement prepared for me to sign.

58. Black then pulls twenty thousand dollars out of the armrest and places it on my lap. I took the money off my lap and placed it on the floor. I could not believe that Maraj would go this far to bribe me again.

59. As a result of these unsolicited calls, contacts, popup visits, and communications, I started having nightmares and panic attacks. The memories began to flood back from the day of Kenny raping me. I began to experience anger, pain, sorrow, anxiety, and trust issues. I started having crying fits and thoughts of paranoia.

60. At the end of May 2020, I received a call from my brother. He was speaking frantically. My brother stated they knew where I lived, what my oldest daughter did during her day, and they threatened to have someone else show up at my house if I did not recant the 1994 rape claim.

61. After receiving this threat, I moved in June of 2020. I changed my phone number and registered the new number under my husband's name. These efforts were unsuccessful in curbing the harassment and unwanted contact shortly after changing my number. I became so paranoid that I moved again in August 2020.

62. Three days after moving in August 2020, U.S. Marshal Roy Wright showed up at my husband's job. I called U.S. Marshal Wright, and he stated that someone had called to report that I was being harassed and they were worried about my safety.

63. The Marshal offered me witness protection. The Marshal also confirmed that the call I received from California was indeed Maraj.

64. In September 2020, while visiting my brother in South Carolina, I was harassed once again. I got a call from a New York Attorney stating that they represent Kenny.

65. The attorney stated they were trying to go to Court to get Kenny off the sex offenders registry and asked about the recantment letter and if I wrote it.

66. In October of 2020, my daughter was at an event in Atlanta, Georgia. At the end of the night, my daughter and her friend group were approached by a man. The man asked, "do you know Zoo?" (Zoo is Kenny's Street name). My daughter yelled at the man and left with her friends.

67. After this incident, I again feared for my family's safety, so I moved to Florida. I was afraid my child would be killed or kidnapped due to the threats from Maraj and Kenny.

68. In November of 2020, I put a YouTube video out speaking about everything I had been going through in hopes of creating a digital footprint just in case something was to happen to me.

69. Bloggers caught wind of the YouTube video and began victim-shaming me, telling their audiences that I was lying, that I was just a white woman trying to make a quick dollar out of the limelight. Maraj's fans claimed, "Nicki said it was a lie, so it is a lie."

70. As a result, I have not worked since May of 2020 due to severe depression, paranoia, constant moving, harassment, and threats from Maraj, Kenny, and their associates. I am currently living in isolation out of fear of retaliation.

71. On August 12, 2021, within days of Kenny reaching a plea agreement in the Central District of California for his failure to register as a sex offender, Black posted a threat to me on his Instagram social media account.

72. In the post, Black said, "Case is over now," referring to the federal criminal case Kenny accepted the plea deal for in the Central District of California. The video went on to say:

- a. "Jon Wayne tv coming soon tell that bitch she will be expose case over now 20k huh,"
- b. "u know u don't fucked uped,"
- c. "Jon wayne tv,"
- d. "you lying ass bitch, 20 thousand,"

73. Black ends the video with a photo of two guns circled, with the words "be safe out here lol" written on the photo. (**Exhibit C**).

74. In fear for my life, I filed a police report in Florida and have since moved to another state out of fear of being found and killed by Kenny, Maraj, Black, or one of their associates.

Recent threats:

75. Since filing this lawsuit, I have received an onslaught of hate messages and threats on Instagram from Maraj's fans and followers. **(Exhibit D)**.

76. The weekend of October 23, 2021, Maraj and Kenny were in Jamaica, Queen's New York. Maraj did a live video on Instagram.

77. During that Instagram live video, Kenney, along with other members of the Makk Ballers set of the Bloods Gang, and Maraj were throwing up gang signs and threatening me.

78. On Twitter, a member of the Makk Ballers set of the Bloods Gang said the following: "Jennifer if you see this, the Makks are coming to get you." **(Exhibit E)**.

79. On October 24, 2021, at 9:22 PM, Kenny's attorney Steven D. Isser, and Maraj's attorney, Judd Burstein, met with and spoke to Lexie Chung. **(Exhibit F)**. This information as provide to me by a blogger. It is important to note this meeting occurred twenty-four hours before Steven D. Isser made an appearance in this case on behalf of Kenny.

80. Upon information and belief, this Lexie Chung person is either my adopted Aunt, Donna Bills, or my adopted cousin, Shiran "Sunday" Grayson, both of whom have ill feelings towards me.

81. Shiran has had a relationship with "Black," who Defendants used as an instrument to get to me and then threaten me.

82. All of the exhibits listed in this declaration are the same exhibits in the declaration signed by me on October 27, 2021 submitted in support of my motion for default judgment against Kenny. Due to the volume of the exhibits, and in the interest of eliminating redundancy, it is incorporated by reference herein.

I declare under penalty of perjury that the preceding is true and correct.

Executed on November 8, 2021.

Jennifer Hough

Jennifer Hough (Nov 8, 2021 22:59 EST)

Jennifer Hough






Hough Decl in Opp to Petty Motion- to Vacate Certificate of DJ- 11:8:21

Final Audit Report

2021-11-09

Created:	2021-11-09
By:	Tyrone Blackburn (tyrone.a.blackburn@gmail.com)
Status:	Signed
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-  Document created by Tyrone Blackburn (tyrone.a.blackburn@gmail.com)
2021-11-09 - 3:54:49 AM GMT- IP address: 108.29.3.148
-  Document emailed to Jennifer Hough (jenniferhough7@gmail.com) for signature
2021-11-09 - 3:55:09 AM GMT
-  Email viewed by Jennifer Hough (jenniferhough7@gmail.com)
2021-11-09 - 3:56:31 AM GMT- IP address: 66.249.88.144
-  Document e-signed by Jennifer Hough (jenniferhough7@gmail.com)
Signature Date: 2021-11-09 - 3:59:42 AM GMT - Time Source: server- IP address: 174.216.3.206
-  Agreement completed.
2021-11-09 - 3:59:42 AM GMT